

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

*This document relates to:*

*Desimone, et al. v. The Islamic Republic of Iran, No.  
21-cv-07679*

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(D)**

Pursuant to Fed. R. Civ. P. 15(d) plaintiffs move the Court to allow substitution of the following parties in the above referenced action. The party being substituted is the decedent of the estate, who was killed in the terrorist attack on the Pentagon on September 11, 2001. The estate, named in the original complaint, did not specifically identify the decedent. The personal representative of the estate remains unchanged.

The following chart demonstrates the how these parties were previously named in the Complaint and how they wish to proceed going forward:

Identification of Party To be Substituted	Reference to Plaintiff in ECF (21-cv-076790)	State of Residence at Filing	Decedent's Name	Paragraph of Complaint Discussing Decedent
Stephanie Desimone, Individually as the Spouse and as the Personal Representative of the Estate of Patrick Dunn	Stephanie Desimone, Spouse of Victim; Representative of the Estate	California	Patrick Dunn	ECF No. 4 (21-cv-07679) at Allegation 1 of Appendix 1

Plaintiffs propose that, upon endorsement of the Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of Court's Office and based on the size of this MDL.

Respectfully submitted,

/s/ Robert Keith Morgan

Robert Keith Morgan (*pro hac vice*)

David J. Dickens (*pro hac vice*)

The Miller Firm, LLC

108 Railroad Avenue

Orange, VA 22960

Tel: 540-672-4224

Fax: 540-672-3055

kmorgan@millerfirmllc.com

ddickens@millerfirmllc.com

Attorneys for Plaintiffs